

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

USDC - BALTIMORE  
25 FEB 19 PM 4:40

UNITED STATES OF AMERICA

v.

DOUGLAS JASON MARTIN,  
Defendant.

CRIMINAL NO.

*20B 25cr 31*  
(Sexual Exploitation of a Child, 18 U.S.C. § 2251(a); Coercion and Enticement of a Minor, 18 U.S.C. § 2422(b); Receipt of Child Pornography, 18 U.S.C. § 2252A(a)(2); Possession of Child Pornography, 18 U.S.C. § 2252A(a)(5)(B); Forfeiture, 18 U.S.C. §§ 2253 and 2428(a), 21 U.S.C. § 853, 28 U.S.C. § 2461)

INDICTMENT

COUNT ONE

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland charges that:

Beginning on or about October 21, 2024 and continuing through on or about October 28, 2024, in the District of Maryland and elsewhere, the defendant,

**DOUGLAS JASON MARTIN,**

did knowingly attempt to employ, use, persuade, induce, entice and coerce a minor female, Minor Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce, such visual depictions would be produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depictions would have actually been transported and transmitted using any means and facility of interstate and foreign commerce, that is, **MARTIN** used a computer and the internet to request the

production of visual depictions of Minor Victim 1 engaged in sexually explicit conduct, intending that the visual depictions be produced and transmitted using a computer and the internet.

18 U.S.C. § 2251(a)

**COUNT TWO**  
(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

On or about December 13, 2024, in the District of Maryland and elsewhere, the defendant,

**DOUGLAS JASON MARTIN,**

did knowingly attempt to and did knowingly employ, use, persuade, induce, entice and coerce a minor female, Minor Victim 2, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such a visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction has actually been transported and transmitted using any means and facility of interstate and foreign commerce, that is, an image that depicts Minor Victim 2 naked with her genitals exposed and displayed in a lascivious manner, said image file having been stored on an iPhone 14 Pro, Serial Number GLQ7T0GP6G, with IMEI 354627903991679, a product of China.

18 U.S.C. § 2251(a)

**COUNT THREE**  
(Coercion and Enticement)

The Grand Jury for the District of Maryland further charges that:

Beginning on or about October 21, 2024 and continuing through on or about October 28, 2024, in the District of Maryland, and elsewhere, the defendant,

**DOUGLAS JASON MARTIN,**

using any facility and means of interstate and foreign commerce, knowingly attempted to and did persuade, induce, entice, and coerce Minor Victim 1, who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, namely, the sexual exploitation of a child in violation of 18 U.S.C. § 2251(a).

18 U.S.C. §§ 2422(b), 2427

**COUNT FOUR**  
(Coercion and Enticement)

The Grand Jury for the District of Maryland further charges that:

Beginning on or about December 11, 2024 and continuing through on or about December 13, 2024, in the District of Maryland, and elsewhere, the defendant,

**DOUGLAS JASON MARTIN,**

using any facility and means of interstate and foreign commerce, knowingly attempted to and did persuade, induce, entice, and coerce Minor Victim 2, who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, namely, the sexual exploitation of a child, in violation of 18 U.S.C. § 2251(a).

18 U.S.C. §§ 2422(b), 2427

**COUNT FIVE**

(Receipt of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about December 13, 2024, in the District of Maryland, and elsewhere, the defendant,

**DOUGLAS JASON MARTIN,**

did knowingly receive, and attempt to receive, any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, and so shipped and transported, by any means including by computer, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and which visual depiction was of such conduct, that is, **MARTIN** received an image file that depicts a minor female naked with her genitals exposed and displayed in a lascivious manner.

18 U.S.C. § 2252A(a)(2)

**COUNT SIX**

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about January 23, 2025, in the District of Maryland, the defendant,

**DOUGLAS JASON MARTIN,**

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed an iPhone 14 Pro, Serial Number GLQ7T0GP6G, with IMEI 354627903991679, a product of China, which contained one or more visual depictions of minors, including at least one visual depiction of a prepubescent minor, engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256



### **FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. of Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 2253 and 2428(a), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c) as a result of the defendant's conviction under any of the offenses set forth in Counts One through Six of this Indictment.

#### **Sexual Exploitation of Children and Receipt and Possession of Child Pornography Forfeiture**

2. Upon conviction of any of the offense(s) set forth in Counts One, Two, Five, or Six of this Indictment, the defendant,

**DOUGLAS JASON MARTIN,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

a. any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, or 2252A, 2252B, or 2260 or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, received or possessed in violation of Title 18, United States Code, Chapter 110;

b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

#### **Coercion and Enticement Forfeiture**

3. Upon conviction of the offense(s) set forth in Counts Three or Four of this Indictment, the defendant,

**DOUGLAS JASON MARTIN,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 2428(a):



a. any interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and

b. any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation.

**Property Subject to Forfeiture**

4. The property to be forfeited includes, but is not limited to: an iPhone 14 Pro, Serial Number GLQ7T0GP6G and IMEI 354627903991679.


**Substitute Assets**

5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

18 U.S.C. § 2253  
18 U.S.C. § 2428(a)  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)

  
Philip A. Selden  
Acting United States Attorney

A TRUE BILL

**SIGNATURE REDACTED**

foreperson

Date: February 19, 2025